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November 10, 2016

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On November 10, 2016, Dan McCarthy, CEO of Frontier Communications, spoke via telephone with Commissioner Mignon Clyburn and Claude Aiken, Wireline Legal Advisor to Commissioner Clyburn, about the Commission's Business Data Services (BDS) proceeding. Mr. McCarthy described Frontier's experience that the BDS market, including both low and high-bandwidth services, is extremely competitive. Although the draft proposal correctly realizes that high-bandwidth services do not require regulation, Mr. McCarthy explained the ways in which the draft BDS proposal would still unduly affect mid-size ILECs like Frontier that do not have a wireless or significant CLEC presence. The result would be deeply harmful to investment in American broadband connectivity and jobs. To that end, Mr. McCarthy requested that the Commission consider an additional transition period for midsize ILECs as well as a lower rate of reduction. Mr. McCarthy also stated the importance of ensuring that the Commission carefully consider the current state of market competition in how it implements any reform to existing grants of Phase II pricing flexibility, noting the particularly competitive nature of the transport market as has been demonstrated in the record.¹

Please contact me with any questions.

Sincerely,

____/s/____

Mike Saperstein

cc: Commissioner Clyburn
Claude Aiken

¹ See Letter from James P. Young, Counsel to AT&T Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 4-11 (Oct. 25, 2016); Letter from Russell P. Hanser, Counsel to CenturyLink Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 1-2 (Oct. 28, 2016); Letter from Russell P. Hanser, Counsel to CenturyLink Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 1-2 (Nov. 10, 2016).